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21 *Attorneys for Plaintiff Jennifer Zimmerman*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 JENNIFER ZIMMERMAN, on behalf of
15 herself and all others similarly situated;

16 Plaintiff,
17 vs.

18 BUDDHA ENTERTAINMENT, LLC d/b/a
19 and a/k/a TAO GROUP also d/b/a and
a/k/a TAO NIGHTCLUB also d/b/a and
a/k/a TAO LV NIGHTCLUB; ASIA LAS
20 VEGAS, LLC d/b/a and a/k/a TAO
GROUP also d/b/a and a/k/a TAO ASIAN
BISTRO; STRIP VIEW
21 ENTERTAINMENT LLC d/b/a and a/k/a
TAO GROUP also d/b/a and a/k/a LAVO
22 LAS VEGAS; DOES 1 through 50,
23 inclusive,

24 Defendants.

25 Case No: 2:18-cv-01460

26 **STIPULATION AND ORDER
TO EXTEND STAY
OF PROCEEDINGS**

27 **(Second Request)**

28 **STIPULATION AND ORDER TO EXTEND STAY OF PROCEEDINGS**

The parties, by and through their respective counsel of record, hereby submit the
following Stipulation and Order to Extend Stay of Proceedings:

1 This matter commenced in state court on July 11, 2018. On August 7, 2018,
2 Defendants removed the action to federal court. ECF No. 1. On August 14, 2018, the
3 parties submitted a Stipulation and Order Extending Time For Defendants to Respond to
4 Plaintiff's Complaint. ECF No. 4. Such Order was entered by this Court on August 16,
5 2018, extending the time for Defendants to respond to Plaintiff's Complaint up to and
6 including September 14, 2018. ECF No. 5.

7 On September 13, 2018, this Court entered its Order to stay the proceedings in this
8 case for ninety (90) days up to and including December 11, 2018 to allow the parties to
9 engage in mediation. ECF No. 10.

10 The parties agreed on a private mediator and scheduled a mediation to be held
11 during such stay. However, due to circumstances beyond the parties' control, the
12 mediation had to be rescheduled for a later date.

13 The parties now seek a 90-day extension of such stay up to and including March
14 11, 2019 in order to conserve expenditures and judicial resources while the parties
15 engage in mediation. This request is not sought for any improper purpose or other reason
16 of delay.

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1 Wherefore, the parties respectfully request that the Court extend the stay of the
2 proceedings in this case for ninety (90) days up to and including March 11, 2019, to
3 allow the parties to engage in mediation.

4 **IT IS SO STIPULATED.**

5 Dated this 11th day of December 2018.

6 Respectfully submitted,

7 /s/ Christian Gabroy

8 Christian Gabroy, Esq.
9 Nev. Bar No. 8805
10 Kaine Messer, Esq.
11 Nev. Bar No. 14240
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28 *Attorneys for Plaintiff*

1 Dated this 11th day of December 2018.

2 Respectfully submitted,

3 /s/ Joshua A. Sliker

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12 *Attorney for Defendants*

13 **IT IS SO ORDERED.**

14 December 12, 2018

15 _____
16 Date

17 _____
18 *Curtis H.*
19 UNITED STATES MAGISTRATE JUDGE